

Modern Slavery Policy

Policy Statement

Purpose

Modern slavery is a crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another, in order to exploit them for personal or commercial gain.

This policy applies everyone working for Orwell or on our behalf in any capacity, including colleagues at all levels, directors, officers, agency workers, relief workers, volunteers, agents, contractors, external consultants and business partners. It also applies to our properties and customers/residents.

Legal Obligations

- Modern Slavery Act 2015

Orwell's Commitment

- Orwell is committed to the principles of the Modern Slavery Act 2015 and the abolition of modern slavery and human trafficking.
- Orwell has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity in all business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere within the business.
- We are committed to creating and ensuring a non-discriminatory and respectful working environment for all colleagues. It is vital that we ensure colleagues feel confident they can expose wrongdoing without any risk to themselves. There are policies in place with clear lines of reporting, to encourage and support this including: Speaking up (Whistleblowing) Policy and Procedure, Code of Conduct and Grievance Policy and Procedure.
- We are committed to ensuring our properties are not being used to accommodate the work of human traffickers or to detain others for human servitude.
- We are committed to ensuring that our customers/residents are not involved in human trafficking in any capacity.

- Our recruitment and people management processes are designed to ensure that all prospective employees/workers are legally entitled to work in the UK and to safeguard employees/workers from any abuse or coercion.
- We do not enter into business with any organisation that knowingly supports or is found to be involved in slavery, servitude and forced or compulsory labour.
- Orwell expects the same high standards from all our contractors, suppliers and other business partners. As part of our contracting processes, we have clear pre-qualification criteria for suppliers, including a requirement to have measures in place to minimise the possibility of modern slavery in their business and supply chain. We expect our contractors and suppliers to sign a declaration stating that they are not involved in modern slavery or human trafficking and are fully compliant with the Modern Slavery Act 2015.
- The responsibility for compliance with the Modern Slavery Act lies with Board and the Executive Team. The Executive Team take responsibility for implementing this policy and its objectives; putting in place adequate resource to ensure human trafficking and modern slavery is not taking place within the business or in any supply chains.
- A Modern Slavery statement is shared on the Orwell website.